

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARIO CAGGIANO,

Plaintiff, **DECLARATION OF KAREN K.
RHAU IN FURTHER SUPPORT
OF DEFENDANTS' MOTION TO
DISMISS THE COMPLAINT**

-against-

NEW YORK CITY DEPARTMENT OF
EDUCATION, ET AL.,

No. 22 CV 03853 (RPK) (TAM)

Defendants.
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KAREN K. RHAU declares, under penalty of perjury and pursuant to 28 U.S.C.
§ 1746, that the following is true and correct.

1. I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants New York City Department of Education ("BOE"), Carmen Amador, Audrey Houston, and Evan Rabinowitz (collectively, "Defendants") in the above-captioned action. This declaration is submitted in support of Defendants' motion to dismiss, pursuant to Rule 12 (b) of the Federal Rules of Civil Procedure, dismissing the Complaint in its entirety.

2. Annexed to this declaration as Exhibit "B" is a true and correct copy of Plaintiff's Official Notice from the SDHR to Defendant BOE Regarding Plaintiff's Administrative Charge.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 28, 2023

/s/ Karen K. Rhau

Karen K. Rhau
Assistant Corporation Counsel